COMMONWEALTH of VIRGINIA

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COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

ArborTech Forest Products, Inc.
500 Dearing Ave., Blackstone (Nottoway County) Virginia
Permit No. BRRO31039

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, ArborTech Forest Products, Inc. has applied for a Title V Operating Permit for its Blackstone facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ 10/7/10
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Air Permit Manager: _____ 10/7/10
David J. Brown

Regional Director: _____ 10/7/10
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1. GENERAL

FACILITY INFORMATION

Permittee
ArborTech Forest Products, Inc.
500 Dearing Ave.
Blackstone, VA 23824

Facility
ArborTech Forest Products, Inc.
500 Dearing Ave.
Blackstone, VA 23824

AIRS ID No. 51-135-00037

SOURCE DESCRIPTION

NAICS Code: 321113 (SIC Code 2421) – Dimensional lumber manufacturing facility (pine lumber) and by-products (i.e., bark, chips, sawdust, and shavings).

The facility is a Title V major source of Volatile Organic Compounds (VOC) and Carbon monoxide (CO). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was previously permitted under a Minor NSR Permit which was issued on June 30, 2000 and superseded by the State Major NSR permit dated August 27, 2002, which was subsequently superseded in succession by permits dated March 3, 2004, August 17, 2006, and October 4, 2007. The current Title V permit, which expires on October 23, 2010, includes the requirements from the October 4, 2007 NSR permit. No significant or insignificant emission units have been added or removed from this facility since the last Title V permit amendment (dated 12/03/2007). However, the applicable requirements for the distillate oil fired boiler B3 which were inadvertently omitted from the previous Title V permit have been added in this renewal. See Section 2.1.2 for details on boiler B3. Since the Title V permit application was not considered timely, the facility does not have an application shield.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on June 30, 2010. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description (Note 4)	Size/Rated Capacity (Notes 1 & 2)	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
B1	B1-1	Hurst Boiler Wood fired boiler Model m-4000-WWF, 2000	28.7 MMBtu/hr	Hurst Boiler multicyclone	B1A	PM	October 4, 2007
B2	B2-1	Hurst Boiler Wood fired boiler Model m-4000-WWF, June 28, 2005.	28.7 MMBtu/hr	Hurst Boiler multicyclone	B2A	PM	October 4, 2007
B3	B3-1	Hurst distillate oil fired-boiler, 2002	9.9 MMBtu/hr	None			
Process A							
K1	K1 – 1 thru 10 (Note 3)	Wellons 54 foot dual track dry (lumber) kiln, 2001	4.37 MBf/hr	---	---	---	October 4, 2007
K2	K2 – 1 thru 10	Wellons 54 foot dual track dry (lumber) kiln, 2001	4.37 MBf/hr	---	---	---	October 4, 2007
K3	K3 – 1 thru 10	Wellons 86 foot dual track dry (lumber) kiln, 2002	6.96 MBf/hr	---	---	---	October 4, 2007
Process B							
P1	P1-1	Howell Metal planer system, 2001	50 MBf/hr	Howell Metal cyclone	P1A	PM	October 4, 2007

Notes:

1. The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.
2. MBf / hr = thousand board feet per hour
3. Each kiln has 10 vents. Alternately, five act as vents and five act as intakes.
4. Date = installed date unless otherwise noted.

EMISSIONS INVENTORY

A copy of the 2009 annual emission update is attached. (See 31039V_R Attachment 1.pdf)

Emissions are summarized in the following tables.

2009 Actual Emissions

	Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO_2	PM_{10}	NO_x
Total	142.6	65.1	1.8	39.1	28.6

2009 Actual Facility Hazardous Air Pollutant Emissions

Pollutant	Hazardous Air Pollutant Emission in Tons/Yr
Methanol	8.6

2. EMISSION UNIT APPLICABLE REQUIREMENTS

2.1.1 Wood fired boilers B1 and B2

Boiler B1 is a 28.7 MMBtu/hr, wood fired unit for which construction and operation was authorized in the NSR permit dated June 30, 2000. The construction of Boiler B2 was authorized in the permit dated August 27, 2002. Boiler B2 is an identical 28.7 MMBtu/hr, wood fired unit that began construction on June 28, 2005 and commenced operation on September 14, 2005. Both boilers are subject to NSPS Subpart Dc but because each has maximum rated heat input capacity less than 30 MMBtu/hr, NSPS requirements are limited to initial notification (which has already been completed and streamlined from the Title V permit) and recordkeeping requirements for fuel consumption. ArborTech is not a major HAP source as defined in 40 CFR 63.2 and these boilers are expected to be subject to the area source National Emission Standards for Hazardous Air Pollutant (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters once that standard is promulgated.

Limits

The limits for boilers B1 and B2 are carried forward from the 2007 NSR permit into the Title V permit:

1. A multicyclone will control PM emissions.
2. A minimum stack height is specified.
3. The approved wood fuel is specified.
4. Boiler and air pollution control equipment operating and training procedures are specified.
5. The allowable emission rates and opacity are limited.
6. Because allowable emissions are calculated assuming 8760 hours of operation at maximum load, the 2007 NSR permit does not limit fuel consumption of boilers B1 and B2.

Monitoring

The monitoring requirements for boilers B1 and B2 are carried forward from the 2007 NSR permit into the Title V permit:

1. The structural integrity of each multicyclone (Ref. B1A, B2A) is confirmed annually.

2. Periodic monitoring requirements for opacity from boilers B1 and B2 are based on observation of the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required, or VEE's as determined by EPA Method 9 are required to demonstrate compliance with the applicable opacity limit.

The hourly and annual particulate matter emission limits from the boilers (Ref. B1 & B2) represent state BACT. In their June 20, 2000 submittal, the applicant provided stack test results for eight similar boilers (identical in size, manufacturer, and combustion design, burning similar fuel). The test results showed that these similar units had PM emissions less than 0.2 lb/MMBtu; however, DEQ chose to use a more conservative limit of 0.3 lb/MMBtu[1], which was more reflective of typical DEQ BACT assessments for small wood fired boilers at that time. The PM and PM-10 control efficiency needed for the multicyclones to meet emission limits has been calculated to be 9.1% and 2.2%, respectively.[2] Because performance tests have indicated that emissions for identical units burning similar fuel were roughly 60% of the particulate emission limits, and because very low control efficiency is required for these units to meet their emission limits, monitoring for proper operation and maintenance of the boilers and controls, combined with periodic monitoring for visible emissions, is considered to be adequate periodic monitoring for PM from these boilers.

The hourly and annual CO emission limits from the boilers (Ref. B1 & B2) represent state BACT. The June 20, 2000 submittal from the applicant provided stack test results for eight similar boilers which indicated CO emissions which were less than 0.3 lb/MMBtu; however, DEQ chose to use a more conservative limit of 0.5 lb/MMBtu[3], which was more reflective of typical DEQ BACT assessments for small wood fired boilers at that time. Because performance tests have indicated that emissions for identical and similar units were roughly 60% of the CO emission limits, and because no control efficiency is required for these units to meet their emission limits, monitoring for proper operation and maintenance of the boilers, including periodic monitoring for visible emissions, is considered to be adequate periodic monitoring for CO from these boilers.

The Department's inspection reports indicate that visible emissions have not exceeded the regulatory limit of 20/27% opacity. Therefore, weekly/monthly (tiered) observation for visible emissions is still considered to be adequate frequency for periodic monitoring for opacity from these boilers and this remains unchanged from the current Title V permit.

The permit also contains emission limits for SO2, VOC, and NOx. These limits were established in accordance with agency practice of establishing emission limits for any criteria pollutant expected to be emitted at a level greater than 0.5 tpy. Although the emission limits are established as BACT they are primarily used for emission inventory purposes and conservative emission factors are used to establish the limits. Monitoring of fuel burned as well as proper operation and maintenance of the boilers is considered adequate for demonstrating compliance.

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[1] DEQ Memo from Melanie Pitrolo to file, dated June 28, 2000

[2] Based on uncontrolled particulate matter emission factors (EMF) from AP 42, Section 1.6, Wood Residue Combustion, Table 1.6-1, 9/03. PM control efficiency equation: 1.0-(0.30 lb/MMBtu/0.33 lb_{AP42}/MMBtu x 100%) = 9.1%. PM-10 control efficiency equation: 1.0-(0.30 lb/MMBtu/(0.29 + 0.017) lb_{AP42}/MMBtu x 100%)= 2.2%

[3] DEQ Memo from Melanie Pitrolo to file, dated June 28, 2000

The requirement for a minimum stack height has been satisfied but remains in the permit. This height requirement was established to ensure that the source operates as described in a minor nsr dispersion modeling analysis. Compliance with this condition was most recently confirmed during a site inspection on June 30, 2010.

Recordkeeping
The recordkeeping requirements for boilers B1 and B2 are carried forward from the 2007 NSR permit into the Title V permit:

1. Records of fuel usage are required.
2. Emission calculation records are required.

In addition, visual emission and maintenance logs are required to verify compliance with the periodic monitoring requirements.

Testing
Testing / monitoring ports are required upon request.

Reporting
The "Recordkeeping and Reporting" requirements of the Title V General Conditions apply to boilers B1 and B2.

Streamlined Requirements
The requirement to notify the Department of the date of the modification to the boilers as required by Condition 17 of the NSR 2007 permit has been met and is deleted as part of this Title V Permit renewal.

Incorporation of NSPS Subpart Dc by reference has been removed from the permit. Due to the capacity of boilers B1 and B2, the only applicable standards from the subpart are notification and recordkeeping requirements. The applicable notification requirement has been completed and applicable recordkeeping requirements are contained in the permit in Condition III.C. Since there are no additional applicable requirements there is no need to incorporate the regulation by reference.

2.1.2 Distillate oil fired boiler B3

Boiler B3 is a 9.9 MMBtu/hr, distillate oil fired unit which was included as a permit-exempt emission unit as part of the NSR permit dated August 27, 2002. Because heat input capacity for this unit is less than 10 MMBtu/hr, it is not subject to NSPS Subpart Dc. Boiler B3 serves as a back up for wood fired boilers B1 and B2 and has not operated since 2005.

Although this unit was not subject to minor nsr permitting, there are applicable regulatory requirements. These limitations for Boiler B3 were inadvertently omitted from the previous Title V permit and are included as part of the current renewal:

1. The approved fuel is distillate oil (ASTM 1 or 2), as requested in the permit application dated 6/2/2002. Fuel sulfur is indirectly limited because ASTM standards 1 or 2 require less than or equal to 0.5%S (by wt) in distillate oil.
2. The maximum allowable SO_2 emissions are limited by 9 VAC 5-40-930 to 2.64K, where K is the boiler's maximum heat input capacity in MMBtu/hr. Since the approved fuel is distillate oil, the maximum sulfur emissions are calculated to be 5.09 lb/hr, which is well below the regulatory limit of 26.14 lb/hr[4].

[4] SOx emission factor from AP 42, Section 1.3, Fuel Oil Combustion, Table 1.3-1, 9/98, is 142S lb per 1000 gallons combusted, where S is the % sulfur (by wt). SOx maximum hourly emissions: (142

3. The maximum allowable PM emissions are limited to 0.6 lb/MMBtu per 9 VAC 5-40-900. Since the approved fuel is distillate oil, the maximum PM emissions have been calculated to be 0.014 lb/hr[5], well below the regulatory limit.
4. Opacity is limited to 20%.

Monitoring and recordkeeping

The following monitoring and recordkeeping requirements for boiler B3 are included in the Title V permit:

1. Fuel supplier records are required to demonstrate that only fuel meeting the specifications for distillate oil is burned in the boiler. Because use of distillate oil indirectly limits sulfur content such that the maximum predicted emission rate for SO2 is less than 20% of the allowable emission rate, fuel records are also considered adequate periodic monitoring to demonstrate compliance with the SO2 emission limit.

2. Periodic monitoring requirements for opacity from boiler B3 is based on observation of the presence or absence of visible emissions. Since the only approved fuel is distillate oil, no visible emissions are expected. However, in the event visible emissions are observed, corrective action is required, or VEE's as determined by EPA Method 9 are required to demonstrate compliance with the applicable opacity limit. Visual emission logs are required to verify compliance with the periodic monitoring requirements. Because maximum predicted emission rate for PM is less than 3% of the allowable emission rate, visible emission monitoring is considered sufficient to demonstrate compliance with the particulate emission limit.

Testing
Testing / monitoring ports are required upon request.

Reporting
The "Recordkeeping and Reporting" requirements of the Title V General Conditions apply to boiler B3.

2.2 Process Equipment

2.2.1 Dry (lumber) kilns K1, K2, and K3
Construction and operation of the dry (lumber) kilns K1, K2, and K3 are authorized in the 2007 NSR permit. Allowable emissions are calculated using the average methanol emission factors from the two full-scale and the four small-scale tests found in Tables 9.5 and 9.6, respectively, of NCASI Technical Bulletin 845. The applicant has provided a demonstration that those specific tests from the database most accurately represent the emissions from their kilns (K1, K2, K3). The practice of using an average of several tests, rather than an isolated value from a series of tests, is the approach used in AP42 to determine emission factors. Also, in the February 16, 2006 revision to 40 CFR 63 Subpart DDDD, EPA acknowledged that operators of dry lumber kilns may calculate their

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lb_{SOx}/kgal x 0.5%S x 9.9MMBtu/hr) / (138,000 Btu/gal) = 5.09 lb/hr; SO2 allowable emissions: 2.64 x 9.9 = 26.14 lb/hr.

[5] PM emission factor from AP 42, Section 1.3, Fuel Oil Combustion, Table 1.3-1, 9/98, is 2 lb per 1000 gallons combusted. Maximum expected PM emissions: (2 lb_{SOx}/kgal) / (138,000 Btu/gal x 1000 gal) = 0.014 lb/MMBtu; Maximum allowable PM emissions: 0.6 lb/MMBtu.

potential to emit (PTE) using emission factors from NCASI's Bulletin 845, and demonstrate that they are not a major source of HAPS (see 31039V_R Attachment 2.doc). Therefore, as shown in the emission calculations (see 31039V_R Attachment 3.doc) this facility is not a major HAP source as defined in 40 CFR 63.2, and is not subject to the provisions of 40 CFR 63 Subpart DDDD, National Emission Standards for Hazardous Air Pollutant (NESHAP) for Plywood and Composite Wood Products (PCWP) per 40 CFR 63.2231(b).

Limits

The following limits for the dry (lumber) kilns K1, K2, and K3 are carried forward from the 2007 NSR permit into the Title V permit:

1. The allowable throughput of wood is limited.
2. The allowable VOC emission rate is limited.

In addition, opacity is limited in accordance with the new source standard for visible emissions. There is no limit on methanol emissions but potential to emit methanol is limited by the wood throughput limit.

Monitoring

Periodic monitoring requirements for opacity from the dry (lumber) kilns K1, K2, and K3 are based on observation of the presence or absence of visible emissions. In the event visible emissions are observed, a VEE as determined by EPA Method 9 is required to demonstrate compliance with the applicable opacity limit.

Because the kilns are a major source of VOC and methanol emissions are near the major source threshold, consideration was given to whether performance testing for VOC and /or methanol emissions is warranted. However, testing of lumber kilns is both technically difficult and expensive.[6] Careful consideration of the selected VOC and methanol emission factors has been previously provided by the applicant, VA DEQ, and EPA. Further, there are no control requirements in the MACT for lumber drying kilns and no identified VOC controls on lumber kilns. Recordkeeping of throughput and calculation of emissions are selected as appropriate periodic monitoring for methanol and VOC emissions from the kilns for the following reasons:

1. Emission factors for this facility have been specifically selected for similarity to this source.
2. It is questionable whether performance testing would provide results of better accuracy than the selected emission factors.

Recordkeeping

The following recordkeeping requirements for the dry (lumber) kilns K1, K2, and K3 are carried forward from the 2007 NSR permit into the Title V permit:

1. Records of wood throughput are required.
2. Emission calculation records are required.

In addition, visual emission logs are required to verify compliance with the periodic monitoring requirements.

[6] Difficulty in monitoring dry kilns is well documented in background documents for the PCWP MACT. See 71FR8347 (PCWP MACT Final Rule) and 70FR44012 (PCWP MACT Proposed Rule).

Testing
Testing / monitoring ports are required upon request.

Reporting for kilns K1 thru K3
The "Recordkeeping and Reporting" requirements of the Title V General Conditions apply to the dry (lumber) kilns K1, K2, and K3.

2.2.2 Planer P1
Construction and operation of planer P1 is authorized in the 2007 NSR permit.

Limits
The following limits for planer P1 are carried forward from the 2007 NSR permit into the Title V permit:

1. A product recovery cyclone reduces PM emissions.
2. The allowable throughput of wood is limited.
3. The allowable particulate matter emission rates and opacity are limited.

Monitoring
The following monitoring requirements for Planer P1 are included in the Title V permit:

1. The structural integrity of the cyclone is confirmed annually.
2. Periodic monitoring requirements for opacity from planer P1 are based on observation of the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required, or VEE's as determined by EPA Method 9 are required to demonstrate compliance with the applicable opacity limit

The allowable particulate emission rate from the planer system was established based on particle size testing performed at two North Carolina facilities. According to a North Carolina Department of Environment and Natural Resources (NC DENR) memo dated April 18, 1996, no planer particles from knife planers used on green wood are smaller than 37 microns, so there are no PM10 emissions from the planer[7]. However, the planer mill loadout system includes sawdust from trimming and grinding of trimmed blocks. Maximum expected emissions are estimated using the following assumptions:

- Amount of trimming sawdust in shavings $\leq$ 1% by weight
- Amount of grinding by-product in shavings $\leq$ 2%, by weight
- Trimming sawdust = 31% PM and 0.37% PM10 (NC DENR memo[8])
- Grinding by-product contains 0.56% PM and no PM10 (NC DENR memo[9])
- By-product retention 85% of PM and no PM10 by the product recovery cyclone[9]

Using these assumptions, maximum expected PM emissions from the planer mill loadout system are calculated to be 15.6 lb/hr and 16.1 tons per year, which is less than the allowable emission rates of 18.7 lb/hr and 35.8 tons/ yr. All factors used in calculating emissions are believed to be conservative and maximum predicted emissions are below the allowable limits; therefore periodic monitoring for opacity and an annual inspection of

[7] DEQ verified by site visit that the planer at ArborTech is a knife planer and that moisture content of wood being cut is 20%, so use of the study is appropriate for estimating emissions.
[8] Draft of Estimating Emissions From Generation and Combustion of "Waste" Wood *July 15, 1998*
[9] Conservative assumptions based on EPA-CICA Air Pollution Technology Fact Sheet for cyclones which states that the control efficiency ranges for high-throughput cyclones are 80 to 99 percent for PM, 10 to 40 percent for PM10, and 0 to 10 percent for PM2.5.

the control device are selected as appropriate periodic monitoring for particulate emissions from the planer system.

Recordkeeping
The following recordkeeping requirements for planer P1 are carried forward from the 2007 NSR permit into the Title V permit:

1. Records of wood throughput are required.
2. Emission calculation records are required.

In addition, visual emission and maintenance logs are required to verify compliance with the periodic monitoring requirements.

Testing
Testing / monitoring ports are required upon request.

Reporting
The "Recordkeeping and Reporting" requirements of the Title V General Conditions apply to planer P1.

3 FACILITY WIDE CONDITIONS

The following applicable requirements for the facility are carried forward from the 2007 NSR permit into the Title V permit:

1. The department may require the facility to reduce operation as necessary to avoid violating a primary ambient air quality standard.
2. Minimum maintenance / operation procedures are specified.
3. Testing / monitoring ports are required upon request.

3.1 MACT applicability

This facility is not a major HAP source and ArborTech's boilers and kilns are not subject to any current major source MACT subpart. Boilers B1, B2, and B3 are expected to be subject to the area source MACT for Industrial/ Commercial/ Institutional Boilers and Process Heaters, once promulgated.

3.2 Compliance Assurance Monitoring (CAM)

CAM applies to an emission unit if that unit (1) has the potential to emit (in the absence of add-on controls) a regulated pollutant in an amount that exceeds its major source threshold, (2) is subject to an emission limitation for that pollutant, and (3) uses a control device to achieve compliance with the emission limitation.

The uncontrolled emission rate for PM (i.e., the only pollutant for which add-on control is required) from each solid fuel Boiler (Ref. B1 and B2) is less than the major source threshold of 100 tons / year. Neither Boiler B3 nor kilns K1, K2, and K3 employ add-on emission controls. Therefore, none of the emissions units B1, B2, B3, K1, K2, or K3 is subject to CAM. Emissions from the by-product recovery cyclone on planer P1 are less than the major source threshold, therefore the planer is not subject to CAM.

There are no CAM affected units at this facility.

4. GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Condition B. Permit Expiration
This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §§2.2-604 and §§10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement No. 2-2003".

Condition F. Failure/Malfunction Reporting
Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Condition J. Permit Modification
This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

Condition T. Malfunction as an Affirmative Defense
The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

5. FUTURE APPLICABLE REQUIREMENTS

Boilers B1, B2, and B3 are expected to be subject to the provisions of the proposed National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers, Subpart JJJJJJ; however, a final determination cannot be made prior to promulgation of that standard. The applicable requirements for Boilers B1, B2, B3 will be determined when the final rule is promulgated.

6. INAPPLICABLE REQUIREMENTS

40 CFR 63 Subpart DDDD, National Emission Standards for Hazardous Air Pollutant (NESHAP) for Plywood and Composite Wood Products regulates emissions from lumber drying kilns at major sources; however, since ArborTech is not a major source of HAP, Kilns K1, K2, and K3 are not subject to this standard.

7. INSIGNIFICANT EMISSION UNITS

Insignificant emission units are listed in Section VIII of the Title V permit.

8. CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

9. PUBLIC PARTICIPATION

The draft and proposed permits will be placed on public notice in the Blackstone COURIER-RECORD on August 19, 2010. The public comment period ended on September 20, 2010 with no comments received by this office.